

Clermont County Continuity of Operations Plan (COOP) Guidance

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Continuity of Operations Plan Guidance Purpose

The purpose of this document is to provide local organizations and government agencies guidance for developing continuity of operations plans. The purpose of continuity planning is to:

- Reduce the consequences of any disruptive event to a manageable level;
- Enable rapid response to the incident; and
- Ensure that essential services can be sustained during/following an emergency or disaster.

The information in this document has been compiled from the following reference materials:

- FEMA Continuity of Operations Plan Template and Instructions for Federal Departments and Agencies, Dated July 2011. www.fema.gov/pdf/about/org/ncp/coop/continuity-plan-template.pdf
- FEMA Continuity Guidance Circular 1 (CGC 1): Continuity Guidance for Non-Federal Entities (States, Territories, Tribal, and Local Government Jurisdictions, and Private Sector Organizations), Dated January 21, 2009. www.fema.gov/pdf/about/org/ncp/coop/continuity guidance circular.pdf
- FEMA Continuity Guidance Circular 2 (CGC 2): Continuity Guidance for Non-Federal Entities: Mission
 Essential Functions Identification Process (States, Territories, Tribal, and Local Government Jurisdictions,
 and Private Sector Organizations), Dated July 22, 2010.
 www.fema.gov/pdf/about/org/ncp/coop/cont_guidance2.pdf
- FEMA Continuity Guidance Circular 2 (CGC 2): Continuity Guidance for Non-Federal Entities: Mission Essential Functions Identification Process (States, Territories, Tribal, and Local Government Jurisdictions, and Private Sector Organizations), FEMA P-789 Dated October 2013. www.fema.gov/media-library-data/1384435934615-7eeac7d0b4f189839f396a3c64eeac7a/Continuity+Guidance+Circular+2.pdf
- Federal Continuity Directive 1 (FCD 1): Federal Executive Branch National Continuity Program and Requirements, Dated February 2008. www.fema.gov/pdf/about/offices/fcd1.pdf
- Federal Continuity Directive 2 (FCD 2): Federal Executive Branch Mission Essential Function and Primary Mission Essential Function Identification and Submission Process, Dated February 2008.
 www.fema.gov/pdf/about/offices/fcd2.pdf

Additional reference documents:

National Security Presidential Directive - 51 (NSPD-51): National Continuity Policy, Dated May 9, 2007.
 www.fas.org/irp/offdocs/nspd/nspd-51.htm

For additional training on continuity of operations planning, visit FEMA Emergency Management Institute Independent Study Courses:

- IS-546.A: Continuity of Operations Awareness https://training.fema.gov/EMIWeb/IS/courseOverview.aspx?code=is-546.a
- IS-547.a Intro to Continuity of Operations
 https://training.fema.gov/EMIWeb/IS/courseOverview.aspx?code=is-547.a

Overview of Continuity Planning

Continuity of operations is the ability to continue essential services during and following an emergency or disaster.

Continuity planning will improve an organization's ability to recover from a disaster. Planning will help to:

- Minimize loss of life, injury, and property damage.
- Reduce or mitigate the length and severity of disruptions that do occur.
- Achieve timely and orderly resumption of essential functions and the return to normal operations.
- Protect essential facilities, equipment, records, and assets.

Risk Management

Risk management is the process of identifying, controlling, minimizing and/or eliminating potential consequences of an emergency or disaster. Organizations should complete a hazard analysis to evaluate:

- The types of hazards that could disrupt operations;
- The likelihood that the disruption(s) will occur;
- The vulnerability to the relevant disruption(s);
- The impact if the disruption would occur; and
- The consequences of not protecting assets or not performing essential functions.

Organizations should then identify strategies to reduce or eliminate the vulnerability and/or consequences of the disruption. Agencies will have to weigh the cost to implement mitigation measures versus the potential impacts of a disruption.

Some continuity mitigation measures include: creating geographically dispersed operations or establishing back up facilities to ensure that if one area is impacted or inaccessible, that essential services can be performed at alternate work locations. Organizations may consider instituting security strategies to protect plans, personnel, facilities, and information systems. Creating redundant systems, remote access capabilities, and alternate work locations will ensure that the organization can resume essential functions in a timely manner.



Critical Elements of Continuity Planning

There are 10 key elements that should be addressed in the continuity plan.

- 1. **Essential Functions/Services** enable an organization to provide vital services, exercise civil authority, maintain public safety, and sustain the industrial or economic base.
- 2. **Orders of Succession** provide for orderly assumption of leadership roles, during an emergency, in the event that officials are unavailable to fulfill their legal duties. Orders of succession should be three deep.
- 3. **Delegation of Authority** formal documents that specify the activities that can be performed by those authorized to act on behalf of the key officials during a continuity event. Organizations should have a clear *line of succession* in the absence of existing leadership and the necessary *delegation of authority* to ensure that succeeding leadership has the legal and other authorities to carry out their duties.

- 4. **Continuity Facilities** alternate or back up facilities that sustain essential functions or services. Organizations should identify adequate locations to ensure continuity of operations.
- 5. **Communications** the capability (including: hardware, software, and trained personnel) to communicate critical information with staff, external stakeholders and media and the technology requirements to sustain essential services. Communication strategies should be redundant, operational within 12 hours, and sustainable for up 30 day or until normal operations are resumed.
- 6. **Vital Records Management** the ability to identify, protect and access electronic and hardcopy documents, references, and records required for the sustainment of essential services.
- 7. **Human Capital** the people required to sustain essential services. Personnel should be cross-trained and vertically trained to be able to perform the functions of their peers and those above and below them in an emergency. Planning considerations include: identifying essential personnel; identifying roles for non-essential employees; establishing alternate work procedures (e.g. teleworking); communicating information to employees; and establishing management practices for continuity events.
- 8. **Training and Exercises** educating staff on continuity plans and procedures will reduce confusion and anxiety during a real-word event.
- 9. **Devolution** is the capability to transfer statutory authority and responsibility from the agency's primary operating staff/facilities to alternate employees/facilities in the event that the continuity personnel/facilities are unavailable.
- 10. **Reconstitution** the process of restoring normal operations at a permanent location.

Phases of Continuity of Operations

Phase 1: Readiness and Preparedness

In this phase, organizations should establish a core planning team and develop a continuity of operations plan (COOP). During the planning process, the team should:

- Identify essential services and functions that must be sustained. Essential Services are those functions that enable the organization to: provide vital services, exercise civil authority, maintain public safety, and sustain the industrial or economic base.
- Evaluate the resources needed to sustain essential functions, including but not limited to leadership, staff, facilities, and communications.
- Develop the continuity plan
- Providing training to staff
- Practice. Drills and exercise provide an opportunity to identify strengths and weaknesses of the plan. The lessons learned should drive updating the plan to address gaps and shortfalls.

Phase 2: Activation and Relocation (0-12 hours)

Immediately following an incident, the plan should be activated and operational within 12 hours. Planning considerations include:

- Authority to activate the plan
- Staff notification and recall procedures
- Role of essential staff versus non-essential staff
- Communication with staff, media and public
- Resources required to support continuity of essential services
- Relocation facility

Phase 3: Continuity of Operations (12 hours - 30 days)

This phase focuses on the period from 12 hours to 30 days or until normal operations have been resumed. Planning considerations include:

- In-processing, orientation, and accounting for personnel
- Transition of responsibilities to the relocated operations
- Guidance for personnel (essential, non-essential, and temporary staff)
- Rotation of Staff identification of replacement staff
- Operations at the alternate facility
- Procurement processes
- Notification to customers, stakeholders, and media
- Demobilization transition back to normal operations at primary facility

Phase 4: Reconstitution

This phase outlines how the organization will transition to normal operations at a permanent facility. Planning considerations include:

- Identification of a permanent facility if the original facility is unavailable
- Resources needed to make the facility operational
- Communication with staff, external stakeholders, and the media
- Documentation procedures for the transfer of vital information and materials
- After-Action Report and Corrective Action Planning

Continuity Planning Process

The planning process is as vital as the final plan. It will provide an opportunity to discuss processes, identify areas for improvement, and develop creative and innovative solutions. It has the potential to improve day-to-day organizational processes, create unity amongst employees, and strengthen relationships with internal and external stakeholders. Successful continuity planning will require the support and buy-in of leadership and staff.

Step 1: Initiate the Planning Process

Continuity plans cannot be created in a vacuum. A collaborative planning team should be created engaging key stakeholders from the following functional areas:

- Information Technology
- Human Resources
- Facilities Management
- Finance/Procurement
- Public Information
- Legal

- Security
- Risk Management
- Operations
- Critical Vendors/Suppliers
- Customers

Step 2: Identify Essential Functions

Essential functions are critical services or activities that must be performed by the organization such as:

- Providing vital services to the public (e.g. water, power, health care, sanitation, transportation)
- Exercising civil authority (e.g. courts, detention facilities)
- Maintaining public safety (e.g. communication, police, fire/EMS)
- Sustaining the economic base (e.g. commerce)

Once the essential functions have been established, the planning team should prioritize them based on criticality, consequences of not providing the service, and timeframe requirements. The planning team may also have to consider the expectations of leadership, internal stakeholders, and external partners. There may be functions that

do not rank high internally, but are critical to the continuity of external organizations, the general public, and the economy (e.g. payroll, social service programs, sanitation services, etc.).

Step 3: Conduct a Risk Analysis

A risk analysis helps to identify potential disruptions to operations. Planners should consider any hazard that could impact the facility or personnel. Planning considerations include:

- Types of hazards
 - o Natural (tornado, flood, earthquake, etc.)
 - o Accidental (fire, water main break, hazardous materials spill/release, equipment failure, etc.)
 - o Man-made (Active Shooter, Hostage situation, Bomb threat, terrorism, etc.)
- Frequency and likelihood of a disruption
- Vulnerability to the disruption
- Consequences of the disruption
- Timeframe Will there be advance warning, no warning? How long with the disruption last?
- Geography Will the incident impact a wide geographic area? Will this impact access to resources that are necessary for the organizations' continuity.

Step 4: Building the Plan

The Continuity of Operation Plans should address the basic questions of:

Who?	Who has authority to activate the plan? Who has authority to act on leadership's behalf if leadership is unavailable? Who will be responsible for implementing plan and components of the plan?				
What?	What is the process for delegating responsibilities, should contingencies not be available? What activities and/or actions are required to sustain essential functions? What resources are required to respond to the disruption?				
When?	When will continuity activities be implemented?				
Where?	Where will continuity activities be relocated to?				
How?	How the activities and actions will be implemented?				

Continuity Plans should:

- Document the resources required to sustain essential services (e.g. personnel, equipment, space, etc.)
- Be executable with or without warning
- Be operational within 12-hours of activation.
- Support sustained operations for up to 30-days.
- Consider other relevant organizational, governmental, and private sector continuity plans and procedures.

Tab A provides a Continuity of Operations Plan Template. Tab B is a COOP Toolkit with relevant templates to assist in the planning process. Agencies are encouraged to utilize the relevant components of these guidance documents. There may be additional items that are unique to your specific organization that need to be added as well.

Step 5: Train and Exercise the Plan

Training and exercising a plan is almost more challenging than writing the plan. However, it is one of the most critical components to the process. It provides an opportunity to:

- Educate staff Providing personnel with information and resources will alleviate some anxiety when a real-world incident occurs. It will also increase the probability that staff will respond to assist the organization during a continuity event. It has the potential to boost morale and build team unity if staff feel included and valued in the process.
- Test continuity plans in a low stressful environment Exercising plans in low stress environment will allow the organization to evaluate the feasibility of processes and procedures outlined in the plan.

Identifying areas for improvement will drive reworking processes and procedures. This process could potentially improve day-to-day processes and create more redundancy in the workforce.

Training can be done on an individual basis or in a group setting. It is important to integrate annual refresher training to ensure all personnel understand their responsibilities and role in a continuity event.

Exercises should be designed to test components of the plan, not to test personnel. Exercises can be discussion-based or operations-based. Discussion-Based exercises provide an opportunity for participants to talk through a particular process or procedure. It is a good way to familiarize staff with current plans and to develop new processes or procedures. Operations-based exercises involve role players who must articulate their actions and/or physically move assets based on the exercise scenario.

For more information on developing exercises, visit the Homeland Security Exercise and Evaluation Program (HSEEP) at www.llis.dhs.gov/hseep.

Following an exercise, an after action meeting should be held to identify strengths and areas for improvement. This information should drive the planning team to go back and modify processes and procedures within the plan.

Step 6: Distributing and Maintaining the Plan

Organizations are constantly evolving, so it is important the Plan be reviewed and updated on an annual basis. Agencies will have staff turnover due to retirements and employee vacancies. Critical resource suppliers may move, go out of business, and/or no longer provide the resources needed. It is important to review procedures, equipment, systems, personnel, and resource rosters routinely.

Conclusion

Every emergency or disaster is unique. There is no way to plan for every possible scenario, but by having a plan your organization can potentially:

- Reduce the damage to life, property and the environment;
- Reduce or mitigate the consequences;
- Reduce the length of time it takes to return to normal operations;
- Lessen the stress on staff, customers, and the general public; and
- Reduce the economic impact on your organization.

Tab A: Continuity of Operations Plan Template

This guidance follows the Emergency Operations Plan format as recommended by FEMA's Comprehensive Preparedness Guide 101 (version 2.0), *Developing and Maintaining State, Territorial, Tribal, and Local Government Emergency Plans*, dated November 2010 (www.fema.gov/pdf/about/divisions/npd/CPG 101 V2.pdf).

Organizations are encouraged to tailor continuity plans to meet their specific needs and requirements.

Organizations may choose to use all portions or only certain sections of the template to build or improve their plan.

Basic Plan

The Basic Plan provides an overview of the organization's approach to continuity of operations. It details continuity policies, describes the organization and assigns tasks. The plan elements listed in this section will provide the foundation for the development of support annexes.

Promulgation Statement

Promulgation gives the plan official status and gives both the authority and the responsibility to the organization/agency/department to perform their tasks. The promulgation statement should briefly outline the organization and content of the continuity of operations plan and describe what it is, who it affects, and the circumstances under which it should be executed. The agency head, or a designee, must approve the continuity of operations plan. The promulgation document enters the plan "in force."

Sample language:

The [Organization]'s mission is to [enter mission statement]. To accomplish this mission, [Organization Name] must ensure its operations are performed efficiently with minimal disruption, especially during an emergency. This document provides guidance for implementing the [Organization Name] Continuity of Operations Plan to ensure the [Organization] is capable of conducting its essential missions and functions under all threats and conditions.

Key personnel who are relocated under this plan are collectively known as the [Insert name of group, such as Emergency Relocation Group]. Upon plan activation, these members will deploy to [insert continuity facility name]. Upon arrival, continuity personnel must establish an operational capability and perform essential functions within 12 hours from the time of the activation of the Continuity Plan, for up to a 30-day period or until normal operations can be resumed.

This plan has been developed in accordance with guidance from *FEMA Continuity Guidance Circular 1 (CGC 1): Continuity Guidance for Non-Federal Entities (States, Territories, Tribal, and Local Government Jurisdictions, and Private Sector Organizations)*, January 21, 2009.

[Organization Head Signature]
[Enter name here]
[Enter title here]
[Enter organization Name here]

Record of Changes

When changes are made to the continuity plan outside the official cycle of the plan update, planners should track and record the changes using a record of changes table. The record of changes will contain, at a minimum, the section/page number of the change, the date of the change, the name of the person who made the change, and a description of the change.

Page #	Section	Date	Initiated by	Description of Change

Record of Distribution

The record of distribution captures who has received copies of the plan. The record of distribution can be used to verify that tasked individuals and organizations/agencies/departments have acknowledged their receipt, review, and/or acceptance of the plan.

Date	# of Copies	Delivery Method	Name, Title, and Agency/Department of Receiver

Purpose, Scope, Situations, and Assumptions

Purpose

This section should explain the importance of continuity planning and why the organization is developing a COOP. It may also discuss the background for planning, referencing recent events that have led to the increased emphasis on continuity planning.

Scope

This section describes the applicability of the plan as a whole, as well as the subordinate activities that may be colocated and/or geographically dispersed. It also describes the applicability to specific personnel groups within the organization. Ideally, plans should address the full spectrum of potential threats, crises, and emergencies (natural and man-made).

Situation

This section outlines why a COOP is needed and summarizes recent risk assessments. The risk assessment should evaluate the potential disruptions/hazards that could impact current operations as well as those that could impact operation of continuity facilities. This includes:

- Identification of potential hazards that could disrupt services.
- An assessment of the vulnerability to, likelihood of, and consequences of the each hazard occurring.
- A cost-benefit analysis of implementing risk mitigation, prevention, or control measures

Planning Assumptions

This section should briefly describe the layout of the COOP and familiarize the readers with underlying assumptions made during the planning process.

Example: This Continuity Plan is based on the following assumptions:

- An emergency condition may require the relocation of **[Organization Name]**'s Emergency Relocation Group (ERG) members to the continuity facility at **[continuity facility name]**
- The **[continuity facility name]** will support ERG members and the continuation of **[Organization Name]** essential functions by available communications and information systems within 12 hours or less from the time the Continuity of Operations Plan is activated, for potentially up to a 30-day period or until normal operations can be resumed
- In the event that ERG deployment is not feasible due to the loss of personnel, the **[Organization Name]** will devolve to **[list devolution office/region]**

Objectives

This section should list the objectives that the plan is designed to meet.

Example: The **[Organization Name]**'s objectives are:

- Ensure that the **[Organization Name]** can perform mission critical functions under all conditions;
- Reduce loss of life and minimize property damage and loss;
- Execute order of succession with accompanying authorities in the event that leadership is unable, unavailable, or incapable of assuming or performing their authorities and responsibilities of the office;
- Reduce or mitigate disruption to operations;
- Ensure **[Organization Name]** has facilities where it can continue to perform mission critical services during a continuity event;
- Protect essential facilities, equipment, records, and other assets, in the event of a disruption;
- Achieve [Organization Name]'s timely and orderly recovery and reconstitution from an emergency; and
- Ensure and validate continuity readiness through and integrated planning, training, and exercise program.

Security and Privacy Statement

This section details the classification of the Continuity Plan. Continuity plans and procedures contain sensitive, organization-specific information that may need to be protected. Organizations should consult with legal counsel to ensure their continuity plans and procedures are properly classified and marked. This section should also contain dissemination instructions, including to whom and via what means the agency will disseminate the plan.

Concept of Operations

This section explains how the organization will implement its Continuity of Operations Plan, and specifically, how it plans to address each critical element. This section should be separated into four phases: readiness and preparedness, activation and relocation, continuity facility operations, and reconstitution. Devolution planning strongly correlates in each phase, and is also addressed in this section.

Phase I: Readiness and Preparedness

Readiness is the ability of an organization to respond to a continuity event. This section should outline the Organization's activation levels and the actions that will occur at each level. This section should also provide information on employee preparedness activities.

Planning considerations include:

- Identification of essential services/functions that must be sustained
- Continuity Activation Levels and the organizational response to the "triggers"
- Staff readiness and preparedness
- Process for training and exercising the continuity of operations plan

Phase II: Activation and Relocation

This section should explain continuity plan activation and relocation procedures from the primary facility to the continuity facility. The plan must provide a process for attaining operational capability at the continuity site(s) with minimal disruption to operations within 12 hours of plan activation. This section should also address procedures and guidance for non-relocating personnel.

Planning considerations include:

- Decision Matrix (e.g. who has the authority to activate the plan, when should the plan be activated, order of succession if leadership if unavailable or incapable of making the decisions).
- Alert and notification procedures
- Role of essential versus non-essential staff
- Process for communicating with staff, media and the public
- Process for relocating operations
- Process for emergency procurement of needed supplies

Phase III: Continuity Operations

The section should identify initial arrival procedures as well as operational procedures for the continuation of essential functions at the continuity facility.

Planning considerations include:

- The process for transitioning from the primary facility to the continuity facility.
- The resource requirements for continuity operations
- Guidelines for site preparation (e.g. advance team role, in-processing, staff accountability, personnel assignments, just-in-time training, security, etc.)
- Emergency procurement processes
- Communication with staff, media and the public

Phase IV: Reconstitution

This section outlines the process for returning to normal operations at a permanent location.

Planning considerations include:

- The process for salvaging and restoring operations at the primary facility
- The process for transitioning to permanent operations (e.g. demobilization of continuity operations; coordination of physical move to normal operations, vital records transfer, etc.)
- Contingency Plans if primary facility cannot be recovered
- Communication with staff, media, and the public

Devolution

This section outlines the process for transferring direction and control to other entities when the organization's leadership and/or staff are unavailable or are incapable of supporting the execution of the organization's essential functions from either its primary location or its continuity locations.

Planning considerations include:

- The process for transferring authority
- Designated entities that will fill the essential functions
- Devolution activation protocols
- The needed resources for devolution and how they will be acquired
- The process for demobilizing devolution operations and restoring normal operations.

Organization and Assignment of Responsibilities

This section should outline the organization structure during a continuity event including delineating responsibilities for each key staff position. This section should also include the interaction with external organizations, contractors and/or vendors required to support continuity operations.

Planning considerations include the procedures, resource requirements, and logistics for:

- Execution recovery strategies
- Relocation to alternate work locations
- Data restoration plan of information technology (networks, servers, desktops/laptops, wireless devices, applications, and data).

Direction, Control and Coordination

This section describes the framework for all direction, control, and coordination activities. This section also provides information on how the Plan fits into other plans horizontally and how higher-level or subcomponent plans are expected to layer on the Plan vertically.

Planning considerations include:

- Orders of succession (e.g. who will assume leadership roles, if leadership is unavailable to fill their duties)
- Process for delegating authority (e.g. what activities will be delegated to those authorized to act on the behalf of leadership).

Communications

The ability of the organization to execute its essential functions at its continuity facilities depends on the identification, availability, and redundancy of critical communications and information technology (IT) systems to support connectivity among personnel, other organizations, critical customers, and the public, during crisis and disaster conditions.

Planning considerations:

- Physical hardware/equipment needed to communicate
- How information will be shared (e.g. what critical information will be shared and to whom does the information need to be relayed)
- Contingency plans if technology fails

Budgeting and Acquisition

This section should identify the people, communications, facilities, infrastructure, and transportation requirements, which are necessary to the successful implementation and management of the organization's continuity program. In addition, the organization must identify and provide funding and specific budgetary guidance and requirements.

Planning considerations include:

- Emergency Procurement Procedures (e.g. who can authorize expenditures; spending thresholds; funding mechanisms, tracking expenditures)
- Critical vendors and suppliers (e.g. name, contact information, negotiated rates (if applicable))
- Contingency plans if traditional procurement processes are unavailable (e.g. pencil and paper)

Plan Development and Maintenance

This section describes the process the department or agency uses to maintain the current plan. The section should identify who is responsible for plan, how often the agency will review and update the plan, and how coordination will occur.

Authorities and References

This section should cite a list of authorities and references that mandate the development of this continuity of operations plan, and provide guidance towards acquiring the requisite information contained in this continuity of operations plan.